

# **EXHIBIT 11**

**From:** Phil O'Beirne <POBeirne@steinmitchell.com>  
**Sent:** Friday, March 09, 2018 5:35 PM  
**To:** Richard L. Brophy; Maggie Szewczyk; Zachary C. Howenstine  
**Cc:** Pat Cipollone; Jonathan E. Missner; Robert B. Gilmore  
**Subject:** Search Terms Response  
**Attachments:** 2018.03.09 Grande - Search Terms Chart Defs v Pls.pdf

Richard,

Attached is a chart reflecting a proposal addressing the remaining terms proposed by Defendants, for discussion purposes. Plaintiffs reserve the right to update these terms if necessary based on factual developments. As we have explained repeatedly, Plaintiffs intend to review responsive documents for relevance prior to production.

We look forward to speaking with you on Monday.

Best Regards,

**Philip J. O'Beirne**  
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